

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION**

JANUARY CREWS-SANCHEZ,
Plaintiff,

v.

FRITO-LAY, INC.,
Defendant.

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Case No. 6:21-CV-00030

JURY TRIAL DEMANDED

**DEFENDANT FRITO-LAY, INC.'S OBJECTIONS AND RESPONSES
TO PLAINTIFF'S SECOND REQUESTS FOR PRODUCTION**

TO: **JANUARY CREWS-SANCHEZ**, Plaintiff in the above-entitled and numbered cause, by and through her attorney of record,

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Pursuant to the Federal Rules of Civil Procedure, FRITO-LAY, INC., Defendant in the above-entitled and numbered cause, serves the following Objections and Responses to Plaintiff's Second Requests for Production.

Defendant earlier produced documents Bates-labeled FRITO/CREWS-SANCHEZ DEF. 000001-000563. Defendant also produced in first supplementation documents

Bates-labeled FRITO/CREWS-SANCHEZ DEF. 000564-000993 and in second supplementation
Bates-labeled FRITO/CREWS-SANCHEZ DEF. 000994-001013.

Dated: March 31, 2022

Respectfully submitted,

By: /s/ Charles G. Meyer, III
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/s/ Alison R. Ashmore
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**ATTORNEYS FOR DEFENDANT,
FRITO-LAY, INC.**

CERTIFICATE OF SERVICE

I hereby certify that on the 31st day of March, 2022, I served a true and correct copy of the foregoing document via electronic mail on the following counsel of record:

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/s/ **Alison R. Ashmore**

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Alison R. Ashmore (Admitted *Pro Hac Vice*)

DYKEMA GOSSETT PLLC

DEFENDANT FRITO-LAY, INC.'S OBJECTIONS AND RESPONSES
TO PLAINTIFF'S SECOND REQUESTS FOR PRODUCTION

REQUEST NO. 25: Please provide all documents related to the issuance of any workplace discipline to any employee of Defendant at the Lynchburg facility accused of violating a confidentiality policy or otherwise improperly disclosing confidential information from January 1, 2017 through the date of this request, and include the type of disciplinary action taken including, but not limited to, reprimands, counseling, suspensions with or without pay, demotions, and/or terminations.

RESPONSE:

Defendant objects to the Request as unreasonably vague in its request for “all documents” pertaining to “any employee of Defendant at the Lynchburg facility accused of violating a confidentiality policy or otherwise improperly disclosing confidential information” as Defendant cannot reasonably identify what documents the Request seeks. Defendant objects to this Request as overbroad, unduly burdensome, and disproportional to the needs of the case to the extent it requires Defendant to review the personnel files of every employee who has worked at the Lynchburg facility since January 1, 2017 in an attempt to identify any potentially responsive records. Defendant further objects to this Request as overbroad, unduly burdensome, and disproportional to the needs of the case and as invading the privacy rights of non-parties in its Request for information about the discipline of other employees who are not parties to this litigation. Such information is confidential to non-party current and former employees that Defendant is not authorized to disclose, irrelevant, and not likely to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, without undertaking a review of every personnel file for every employee who has worked at the Lynchburg facility since January 1, 2017, Defendant responds that no additional documents have been identified that have not previously been produced in this matter.